

REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed March 19, 2004. Claims 1-24 remain pending in the application. Applicant respectfully requests reconsideration and favorable action in this case.

Rejections under 35 U.S.C. § 103

Claims 1-24 stand rejected as obvious over U.S. Published Application No. 2002/0152237 ("Cohen") in view of U.S. Patent No. 5,991,735 ("Gerace"). Applicant respectfully traverses this rejection.

In order to establish a prima facie case of obviousness, the Examiner must show that the prior art references teach or suggest all of the claim limitations. The Applicant respectfully points out that the Examiner has failed to establish a prima facie case of obviousness. More specifically, the Examiner has not shown that each of the claim limitations is present in the references. Consequently, the rejection must fail.

As to Claim 1, the Examiner asserts that Cohen teaches using pre-programmed basic comparison rules to represent statistical information about the visitors sessions on a web site, putting tracked data in an appropriate structure, wherein the sessions are recorded with three primary dimensions, identity, location, and time and recording parent and child sited accessed during a session. Therefore, the Examiner asserts, Cohen teaches that each entry in the database is made to record the users session wherein each entry pertains to the page visited in accordance with the order it is visited, the associated time of each visit and who accessed the page.

The Examiner admits that Cohen fails to teach receiving a frame identifier and a first network address at a first time, but asserts that Gerace records a viewing history that includes the referring link (first frame identifier and a first network address at a first time).

Claim 1 recites receiving a first frame identifier and a first network address at a first time. Thus, the disclosed method of tracking movement between network addresses receives a first network address and a frame identifier which indicates a frame from which the request for the first network address was made. This frame identifier may be unique to the particular

frame independent of a network address, as the method works substantially the same if the user has more than one copy of a browser application open at client computer 12. Each copy may have its own frame identifier, as generated by client computer 12. (Paragraph [0035]). In contrast, Cohen discloses three dimensions of a user session with a web site, Identity – who is accessing a site, Location – which pages are being accessed, Time – when did the access occur, while Gerace discloses only receiving the referring link from which user accessed a program. (Col. 7, Lines 5-10). Because Cohen and Gerace only disclose utilizing which pages are being accessed and the referring link (or URL) from which a user accessed a program, neither Cohen nor Gerace discloses receiving a frame identifier and a first network address at a first time as recited in Claim 1.

Claim 1 additionally recites finding a record including the first frame identifier, a second network address, and a second time wherein the second time precedes the first time. As mentioned above, neither Cohen nor Gerace using a frame identifier, consequently neither Cohen nor Gerace can disclose finding a record including the first frame identifier, a second network address and a second time. Additionally, Examiner asserts that Cohen teaches putting tracked data during a user's session in the appropriate structure. Applicant respectfully disagrees with the Examiner's assessment of Cohen. Prior to tracking and recording user sessions, and applying them to repair anomalies of the web site, the construction of the web site must be analyzed and utilized to setup data matrices and structures. It is information from these matrices and structures which is mapped and analyzed to repair the web site. Subsequent to the analysis and storage of the web site construction parameters, Cohen records the user sessions using an approximation method. These approximate recorded user sessions are then used along with the stored structure of the web site to form a series of matrices and structures to represent statistical information. (Paragraphs [0005-0006], [0013]-[0014], [0021]-[0022]). Consequently, Cohen uses data structures and matrices to store the structure of a web site or statistical information, and these data structures and matrices of Cohen cannot function as the records recited by Claim 1, which include a first frame identifier, a second network address and a second time. Furthermore, neither Cohen nor Gerace mentions accessing a record continuing a second network address or a second time, wherein the second time precedes the first time.

Claim 1 also recites generating an entry for a table, that includes the first frame identifier, the first network address, the second network address, and a third time. As discussed above neither Cohen nor Gerace discloses the use of a frame identifier as asserted

by the Examiner. Additionally, for the same reasons as discussed above, Cohen does not disclose generating an entry for a table, and certainly does not disclose generating a table entry including a frame identifier, a first and second network address, and a third time.

As to Claims 8, 13 and 20, Applicant respectfully asserts that Claims 8, 13 and 20 recite limitations similar to Claim 1 and the arguments regarding Claim 1 similarly apply to these claims as well. Consequently, Applicant respectfully requests the withdrawal of the rejections of Claims 8, 13 and 20 and their respective dependent Claims 9-12, 14-19 and 21-24.

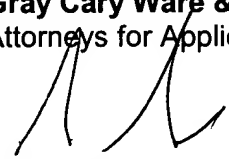
CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-24. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-0456 of Gray Cary Ware & Freidenrich, LLP.

Respectfully submitted,

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